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6 UNITED STATES DISTRICT COURT

7 DISTRICT OF ARIZONA

8 In Re Bard IVC Filters Products  
9 Liability Litigation

No. MD-15-02641-PHX-DGC

10 This document relates to  
11 *Lopez v. C. R. Bard and Bard*  
*Peripheral Vascular, Inc.*  
12 *Case No. CV-17-01880-PHX-DGC*

***EX PARTE MOTION TO SEAL  
PREVIOUSLY FILED DOCUMENT***

13 Plaintiff's Counsel moves this Court, pursuant to Local Civil Rule 5.6 and  
14 respectfully requests that the previously filed Stipulation to Dismiss (Doc. No. 21561) be  
15 permanently sealed. The Stipulation was inadvertently filed with a confidential document  
16 attached at page 3 which warrants protection from public disclosure.

17 RESPECTFULLY SUBMITTED this 18<sup>th</sup> day of September 2020.

18 LOPEZ McHUGH LLP

19 By: /s/ Ramon Rossi Lopez  
20 Ramon Rossi Lopez (CA Bar No. 86361)  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of September 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Marilyn B. Wass